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9
 10 IN THE UNITED STATES DISTRICT COURT
 11 FOR THE DISTRICT OF ARIZONA

12 United States of America,
 13 Plaintiff,

14 vs.
 15 Santos Alvarado Baltazar,

16 Defendant.

No. CR-22-143-PHX-DJH (DMF)

**REDACTED
INDICTMENT**

VIO: 18 U.S.C. §§ 1152, 2244(b), and
 2246(3)
 (CIR - Abusive Sexual Contact of a
 Minor)
 Counts 1-3

18 U.S.C. §§ 1152, 2241(c), and
 2246(2)(D)
 (CIR - Aggravated Sexual Abuse of a
 Child)
 Count 4

18 U.S.C. §§ 1152, 2244(a)(5), and
 2246(3)
 (CIR - Abusive Sexual Contact of a
 Minor)
 Count 5

25 THE GRAND JURY CHARGES:

COUNT 1

27 On or about January 31, 2020, in the District of Arizona, within the confines of the
 28 Gila River Indian Reservation, Indian Country, defendant, SANTOS ALVARADO

1 BALTAZAR, did knowingly engage in a sexual contact with the victim, Jane Doe 1, an
2 Indian, without the victim's permission. The sexual contact involved intentional touching,
3 directly and through the clothing, of the victim's breast with the defendant's hand, with an
4 intent to abuse, humiliate, harass, and degrade the victim and arouse and gratify the sexual
5 desire of the defendant.

6 In violation of Title 18, United States Code, Sections 1152, 2244(b), and 2246(3).

7 COUNT 2

8 On or about January 31, 2020, in the District of Arizona, within the confines of the
9 Gila River Indian Reservation, Indian Country, defendant, SANTOS ALVARADO
10 BALTAZAR, did knowingly engage in a sexual contact with the victim, Jane Doe 1, an
11 Indian, without the victim's permission. The sexual contact involved intentional, direct
12 touching of the victim's breast with the defendant's mouth, with an intent to abuse,
13 humiliate, harass, and degrade the victim and arouse and gratify the sexual desire of the
14 defendant.

15 In violation of Title 18, United States Code, Sections 1152, 2244(b), and 2246(3).

16 COUNT 3

17 On or about January 31, 2020, in the District of Arizona, within the confines of the
18 Gila River Indian Reservation, Indian Country, defendant, SANTOS ALVARADO
19 BALTAZAR, did knowingly engage in a sexual contact with the victim, Jane Doe 1, an
20 Indian, without the victim's permission. The sexual contact involved intentional touching,
21 directly and through the clothing of the victim's genitals with the defendant's hand, with
22 an intent to abuse, humiliate, harass, and degrade the victim and arouse and gratify the
23 sexual desire of the defendant.

24 In violation of Title 18, United States Code, Sections 1152, 2244(b), and 2246(3).

25 COUNT 4

26 On or between April 27, 2018, and April 27, 2019, in the District of Arizona, within
27 the confines of the Gila River Indian Reservation, Indian Country, defendant, SANTOS
28 ALVARADO BALTAZAR, did knowingly engage in and attempt to engage in a sexual

1 act with the victim, Jane Doe 2, an Indian child under the age of 12. The sexual act involved
2 intentional touching, not through the clothing, of victim's genitalia with the defendant's
3 hand, with an intent to abuse, humiliate, harass, and degrade the victim and arouse and
4 gratify the sexual desire of the defendant, to wit: the last time.

5 In violation of Title 18, United States Code, Sections 1152, 2241(c), and
6 2246(2)(D).

7 COUNT 5

8 On or between April 27, 2018, and April 27, 2019, in the District of Arizona, within
9 the confines of the Gila River Indian Reservation, Indian Country, defendant, SANTOS
10 ALVARADO BALTAZAR, did knowingly engage in a sexual contact with the victim,
11 Jane Doe 2, an Indian child under the age of 12. The sexual contact involved intentional
12 touching, directly and through the clothing of the victim's genitals and buttocks with the
13 defendant's hand, with an intent to abuse, humiliate, harass, and degrade the victim and
14 arouse and gratify the sexual desire of the defendant, to wit: the last time.

15 In violation of Title 18, United States Code, Sections 1152, 2244(a)(5), and 2246(3).

16 A TRUE BILL

17
18 /s/
19 FOREPERSON OF THE GRAND JURY
Date: March 8, 2022

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22 /s/
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